<u>REMARKS</u>

In the Final Office Action[1], the Examiner rejected claims 1-21 under

35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application No.

2005/0065951 to Liston et al. ("*Liston*") in view of U.S. Patent No. 6,360,223 to Ng et al.

("*Ng*").

I. Regarding the rejection of claims 1-21 under 35 U.S.C. § 103(a) as being unpatentable over *Liston* in view of *Ng*

Applicants respectfully request that the Examiner reconsider and withdraw the

rejection of claims 1-21 because a *prima facie* case of obviousness has not been

established with respect to these claims.

> To establish a *prima facie* case of obviousness, three basic criteria must
> be met. First, there must be some suggestion or motivation, either in the
> references themselves or in the knowledge generally available to one of
> ordinary skill in the art, to modify the reference or to combine reference
> teachings. Second, there must be a reasonable expectation of success.
> Finally, the prior art reference (or references when combined) must teach
> or suggest all the claim limitations. The teaching or suggestion to make
> the claimed combination and the reasonable expectation of success must
> both be found in the prior art, and not based on applicant's disclosure. *In
> re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). M.P.E.P.
> § 2142, 8th Ed., Rev. 2 (May 2004), p. 2100-128.

A *prima facie* case of obviousness has not been established because, among other

things, neither *Liston* nor *Ng*, taken alone or in combination, teach or suggest each and

every element recited by Applicants' claims.

Claim 1 recites a computer program product, tangibly embodied in an information

carrier, comprising instructions operable to cause data processing apparatus to:

---

[1] The Office Action contains a number of statements reflecting characterizations of the related art and
the claims. Regardless of whether any such statement is identified herein, Applicants decline to
automatically subscribe to any statement or characterization in the Office Action.

receive a specification . . .;

derive one or more data dependency relationships from the data mappings, each data dependency relationship being directed from a controller to one other controller or to one model, one data dependency relationship being derived whenever there is at least one data mapping between the controller and the other controller or the model;

. . .

(emphasis added). *Liston* does not teach or suggest at least these elements. The Examiner cites paragraphs 0009 and 0042, of *Liston*, asserting that these paragraphs teach the claimed, "derive one or more data dependency relationships from the data mappings, each data dependency relationship being directed from a controller to one other controller or to one model, one data dependency relationship being derived whenever there is at least one data mapping between the controller and the other controller or the model" (Office Action at page 3). This is not correct.

Paragraph 0009 of *Liston* discloses a prior art Model-View-Controller (MVC) application architecture. The MVC application architecture comprises applications 110, 120, and 130 (Fig. 1B). Model 111 "represents data and rules, e.g. access and modification, specific to application 110," "notifies view 112 when it changes and enables view 112 to query model 111 about its state," and "enables controller 113 to access application functionality" (paragraph 0009). "View 112 defines how model 111 is shown and forwards user feedback to controller 113" (paragraph 0009).

"Controller 113 defines application behavior and handles user interaction, i.e. it interprets and maps user feedback into actions to be performed by model 111" (paragraph 0009). There is no teaching in paragraph 0009 of *Liston* of deriving "one or more data dependency relationships from the data mappings." Any mapping that

occurs in this paragraph is used to send interpreted user feedback to a model 111 for performance. The act of mapping user feedback into actions for performance does not teach or suggest deriving "one or more data dependency relationships from the data mappings," as recited in claim 1.

Paragraph 0042 discloses a CIFE iRoom. Data elements, stored in the data structures of the various elements, are mapped "to a Shared Project Data Model 200 in a bidirectional fashion" (paragraph 0042 and Fig. 2). Elements 211 and 221, contained within applications 210 and 220, respectively, are mapped, or sent, to the Shared Project Data Model 200. These elements are mapped to Shared Project Data Model 200 and stored in Shared Project Data Model 200 "to provide cross application functionalities" (paragraph 0037).

The step of mapping elements 211 and 221 from an application to Shared Project Data Model 200 in *Liston* does not constitute the claimed "derive one or more data dependency relationships from the data mappings," as recited in claim 1. No data dependency relationships are derived. On the contrary, elements are mapped from an application to a data model and stored in the model. A one-to-one mapping of elements from an application to a model does not "derive one or more data dependency relationships." Therefore, *Liston* also does not teach or suggest "one data dependency relationship being derived whenever there is at least one data mapping between the controller and the other controller or the model," as further recited in claim 1.

The Examiner correctly notes that *Liston* "does not explicitly indicate 'and visualize the data dependency relationships by displaying a link for each of one or more

data dependency relationships, each link showing a direction of data dependency'"
(Office Action at page 3). However, the Examiner alleges that *Ng* teaches this element
of claim 1.

Even assuming this allegation is true, which Applicants do not concede, *Ng* fails
to cure the deficiencies of *Liston* discussed above. *Ng* discloses "a user interface to
view and enter information relating to mapping rules for use with a mapping tool that
maps data between data models according to the rules" (col. 3, lines 12-14). *Ng* does
not teach or suggest "derive one or more data dependency relationships from the data
mappings, each data dependency relationship being directed from a controller to one
other controller or to one model, one data dependency relationship being derived
whenever there is at least one data mapping between the controller and the other
controller or the model," as recited in claim 1.

Accordingly, *Liston* and *Ng* fail to establish a *prima facie* case of obviousness
with respect to claim 1, at least because the references fail to teach each and every
element of the claim. Claims 2-14 depend from claim 1 and are thus also allowable for
at least the same reasons as claim 1.

Independent claims 15, 18, and 21, though of different scope from claim 1, recite
limitations similar to those set forth above with respect to claim 1. Claims 15, 18, and
21 are therefore allowable for at least the reasons presented above. Claims 16-17 and
19-20 are also allowable at least due to their dependence from claims 15 and 18
respectively.

II. Conclusion

In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.
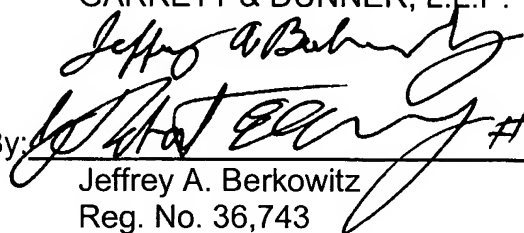
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: January 8, 2007

By:

Jeffrey A. Berkowitz
Reg. No. 36,743